

## Part 1 Declaration

### Site Name and Location

Site Name: Wyckoff/Eagle Harbor

Location: Bainbridge Island, Kitsap County, Washington

Latitude: 47.61535 North, Longitude -122.49986 West

U.S. Environmental Protection Agency (EPA) identification number: WAD 009248295

### Statement of Basis and Purpose

This document presents the decision by the U.S. Environmental Protection Agency (EPA) to implement additional cleanup actions at the Wyckoff/Eagle Harbor Superfund Site in Bainbridge Island, Washington. This decision amends the 1994 Record of Decision for the East Harbor Operable Unit (OU1) and the 2000 Record of Decision for the Soil and Groundwater Operable Units (OU2 and OU4). The additional cleanup actions include dredging and capping contaminated beach sediments, improving the access road, and replacing the aging perimeter steel sheet pile wall. These actions were chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 United States Code §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Part 300, as amended. This decision is based on the administrative record for the site.

The State of Washington, acting through the Washington Department of Ecology (Ecology), concurs with the selected remedy.

### Assessment of the Site

The Selected Remedy in this Interim Record of Decision Amendment (RODA) is necessary to protect the public health ~~or and~~ welfare ~~and/or~~ the environment from actual or threatened releases of hazardous substances, pollutants, ~~and/or~~ contaminants into the environment.

### Description of the Selected Remedy

In the intertidal beaches adjacent to the former Wyckoff wood treating facility, the current remedy is monitored natural recovery. This interim RODA modifies the 1994 cleanup decision for portions of the intertidal beaches with the decision to remove source material from the sediments through dredging and offsite disposal, and install a cap to contain any potential future NAPL seepage. Dredging and capping will treat or remove source materials constituting principal threats in OU1.

The Selected Remedy for the intertidal beaches adjacent to the former wood treating area includes:

- Dredging approximately 6,600 cubic yards of contaminated sediment from select areas of the beaches
- Backfilling dredged areas with a multi-layer cap, including sorbent materials at the base of the cap to retard upward migration of contaminants left below the cap, then restoring dredged areas to grade with clean, imported materials

- Offsite (landfill) disposal of dredged sediments
- Monitoring to confirm dredged and backfilled areas remain clean
- Monitoring outside active cleanup areas to confirm the effectiveness of natural recovery
- Institutional Controls, e.g., under the Washington UECA, to prohibit activity that could disturb the capped areas of the beach, resulting in exposure to contaminants of concern left in place beneath the caps.

In the upland (OU2/4) portion of the former Wyckoff wood treating facility, the current remedy is containment. A steel sheet pile wall around the perimeter of the site is a key element of the containment system. The above-ground portion of the wall is rapidly corroding and whole sheet-pile wall must be replaced. The Selected Remedy is a new reinforced concrete wall, to be built adjacent (seaward) to the existing wall. The Selected Remedy also includes improvements to the existing access road needed to support use of the road by large trucks and other construction equipment.

### **Statutory Determinations**

The Selected Remedy is protective of human health and the environment, complies with federal and State requirements that are applicable or relevant and appropriate to the remedial action, is cost effective, and utilizes permanent solutions and alternative treatment technologies the extent practicable for this Site.

The Selected Remedy satisfies the statutory preference to use engineering controls for contaminated sediments that pose a low long-term threat through the use of sorbent materials in the base of the cap and through containment in an offsite landfill to reduce mobility.

This RODA is an interim decision. The Selected Remedy addresses two time-critical risks at the Site: ongoing human exposure to contaminants on the beaches, and the potential for catastrophic failure of the current perimeter wall. Additional actions needed to address contaminated soils and groundwater in the upland portion of the former wood treating facility will be presented in a future decision document.

Because this remedy will result in hazardous substances, pollutants, or contaminants remaining onsite above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years after initiation of remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

### **RODA Data Certification Checklist**

The following information is included in the Decision Summary (Part 2) of this RODA. Additional information can be found in the Administrative Record for the site.

- Contaminants of concern and their respective concentrations (Section 5)
- Baseline risks represented by the contaminants of concern (Section 7)
- Cleanup levels established for contaminants of concern (Section 8)
- How source materials constituting principal threats are addressed (Section 11)
- Current and reasonably anticipated future land use assumptions and current and potential future beneficial uses of ground water used in the baseline risk assessment and the RODA (Section 6)

- Potential land and surface water use that will be available at the site as a result of the selected remedy (Section 6)
- Estimated capital, annual O&M, and total present worth costs; discount rate; and the number of years over which the remedy cost estimates are projected (Section 13)
- Key factors that led to the selection of the remedy (Section 10)

Approved by U.S. Environmental Protection Agency, Region 10:

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Sheryl L. Bilbrey, Director  
Office of Environmental Cleanup

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Date